UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 0 3 2006

Dr. Thomas Bjerstedt
Minerals Management Service
MS 5412
1201 Elmwood Park Blvd.
New Orleans, LA 70123

RE: Long Island Offshore Wind Park Scoping Comments

Dear Dr. Bjerstedt:

The Environmental Protection Agency (EPA) would like to comment on the Minerals Management Service's (MMS) Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Long Island Offshore Wind Park LLC (LIOWP). LIOWP has requested a lease, easement, or right-of-way to construct and operate a wind energy facility in federal waters off Long Island, 3.6 miles southwest of Jones Beach Island, Nassau and Suffolk Counties, New York. The purpose of the project is to provide a utility-scale renewable energy facility that would consist of forty wind turbine generators mounted on individual steel tower monopiles, with interconnecting submarine electrical cables, an offshore electric substation platform and a submarine electric transmission cable leading from the offshore electric substation platform to the mainland of Long Island to an existing upland electric substation.

EPA concurs that an EIS is the appropriate vehicle for an environmental review of the LIOWP under the National Environmental Policy Act. The following comments are based on project specifics in the original plan for the LIOWP, as described in the New York District Army Corps of Engineers Public Notice Number 2005-00365-L4 and are similar to those we previously sent to the Corps.

1. Based upon our understanding of the project, all or portions of this project may be subject to General Conformity (58 FR 63214). The MMS should make a determination as to whether General Conformity is applicable for this project. In this vein, we also recommend that the applicant explore the use of newer vessel engines with lower emissions, emission retrofits, low sulfur fuel, or fuel emulsions on all construction equipment.

2. Driving the individual monopile towers will cause a temporary noise increase to the area for approximately 80 days. In addition, electrical equipment within the monopile will cause a continual noise for the operational lifetime of the wind park. The impact of these noises to marine mammals and fish in the area should be evaluated.

3. There will be a long term conversion of habitat after the placement of the monopiles. While placement of the piles and scour control mats will eliminate benthic habitat, the monopiles themselves will act as patch reefs and will support an array of encrusting invertebrates and fish. These patch reefs will also provide stationary foraging opportunities for pelagic fish species, sea turtles and sea ducks. This change in habitat should be evaluated for long term impacts.

4. Construction impacts should be analyzed and any mitigation for those impacts described.

5. If the area around the wind park is closed to fishermen as a safety precaution, an economic analysis of the loss of this area to commercial and recreational fishing must be prepared. A discussion of the impacts of a closed zone on small commercial or recreational aviation (such as those that fly parallel to beaches with advertisements) should be prepared as well.

6. An environmental justice analysis should be prepared to determine whether any racial, ethnic, or socioeconomic group is bearing a disproportionate share of the negative environmental consequences resulting from the construction or operation of the wind park.

7. As the Long Island Offshore Wind Park would be among the first of its kind in the nation, EPA would expect that a long term monitoring program will be put in place to assure that large scale changes to the environment, due the presence of the turbines, are not occurring, and that any impacts are recorded, and that data be made available to the public.

8. The 138 kilovolt offshore to onshore submarine electrical cable will be buried a minimum of six feet in the floor of the Atlantic Ocean and the Great South Bay using an underwater hydraulic jet plow. While sand resuspension in the open ocean may not be a significant issue, we are concerned about sediment resuspension in the Amity Cut Channel in the Great South Bay. Impacts to water quality, benthic habitat and possible contaminant resuspension must be analyzed.

9. Any environmental impacts to wetlands associated with cable placement in the Great South Bay and onto Long Island must be analyzed.

10. A small emergency diesel generator and fuel tank with spill containment will be installed in the offshore electrical substation platform. The size of the fuel tank and spill containment measures should be described.

11. The south shore of Long Island is periodically hit by hurricanes, such as the 1985 Hurricane Gloria, a category 2 storm. The analysis of the wind park should include the impacts of a credible scenario hurricane strike on the integrity of the turbines.

12. The site for construction material laydown must be identified, and any impacts (e.g., traffic, air quality, noise) should be discussed.

13. Any impacts associated with the maintenance of the turbines must be identified.

14. Lights will be placed on the monopiles to warn both aircraft and vessels. The types, placement and impacts of these lights on bird, fish, marine mammals, and the residential areas of the south shore of Long Island must be evaluated.

15. Possible impacts of any type to threatened or endangered species must be analyzed.

16. The project may impact birds that use and/or transit the area, either as habitat or during migration. Of particular concern are the potential effects of the turbine blades to the endangered Piping Plover (*Charadrius melodus*) and Roseate Tern (*Sterna dougallii dougallii*). A baseline study of avian use of the area is necessary in order to determine possible impacts to bird populations.

17. The project's potential to decrease Long Island's reliance on coal, oil and natural gas for electric power generation and the potential environmental benefits of such a change should be described. Of particular interest is the potential to reduce air pollution and greenhouse gas emissions.

Thank you for the opportunity to offer scoping comments for this project. If you need additional information about EPA's comments, please have your staff contact Lingard Knutson at (212) 637-3747.

Sincerely yours,

John Filippelli, Chief
Strategic Planning Multi-Media Programs Branch